

1 **TIFFANY & BOSCO**  
P.A.

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8 Attorney for Movant: JPMorgan Chase Bank, N.A., successor in  
9 interest by purchase from the Federal Deposit Insurance  
10 Corporation, as receiver for Washington Mutual Bank  
11 Movant File No: 15-80605

12 **UNITED STATES BANKRUPTCY COURT**

13 **Northern District of California - Oakland Division**

14 In Re:

No. 12-44701

15 Tim Jess Cardona and Deana Rene  
16 Cardona,

Chapter 13

17 Debtors.

NOTICE OF APPEARANCE AND  
REQUEST FOR SPECIAL  
NOTICE

18 **TO: THE UNITED STATES BANKRUPTCY COURT, ALL INTERESTED PARTIES,**  
19 **AND THEIR ATTORNEYS OF RECORD.**

20 PLEASE TAKE NOTICE that JPMorgan Chase Bank, N.A.,  
21 successor in interest by purchase from the Federal Deposit  
22 Insurance Corporation, as receiver for Washington Mutual Bank, by  
23 and through its attorney of record, hereby requests special  
24 notice of all events relevant to the above-captioned bankruptcy  
25 and copies of all pleadings and documents filed in the above-  
26 captioned case, including all pleadings and notices under Federal  
27 Rules of Bankruptcy Procedure, Rule 2002, the commencement of any  
28 adversary proceedings, the filing of any requests for hearing,

1 objections, notices of motion, and/or any other auxiliary filing,  
2 as well as notices of all matters which must be noticed to  
3 creditors, creditors' committees, and/or parties-in-interest and  
4 any and all other notices as required by the United States  
5 Bankruptcy Code, Bankruptcy Rules or the Local Rules of the  
6 above-referenced Bankruptcy Court.

7 JPMorgan Chase Bank, N.A., successor in interest by purchase  
8 from the Federal Deposit Insurance Corporation, as receiver for  
9 Washington Mutual Bank requests that, for all notice purposes and  
10 inclusion in the Master Mailing List in this case, the following  
11 address be used:

12  
13 **Chase Records Center**  
14 **Attn: Correspondence Mail**  
15 **Mail Code LA4-5555**  
16 **700 Kansas Lane**  
17 **Monroe, LA 71203**

18 This Request for Special Notice or any subsequent  
19 appearance, pleading, claim, proof of claim, documents, suit,  
20 motion, or any other writing or conduct, shall not constitute a  
21 waiver of JPMorgan Chase Bank, N.A., successor in interest by  
22 purchase from the Federal Deposit Insurance Corporation, as  
23 receiver for Washington Mutual Bank's (a) right to have any and  
24 all final orders in any and all non-core matters entered only  
25 after *de novo* review by the United States District Court, (b)  
26 right to receive service pursuant to Federal Rules of Civil  
27 Procedure, Rule 4, made applicable to the instant proceeding by  
28 Federal Rules of Bankruptcy Procedure, Rule 7004, not  
withstanding JPMorgan Chase Bank, N.A., successor in interest by

1 purchase from the Federal Deposit Insurance Corporation, as  
2 receiver for Washington Mutual Bank's participation in the  
3 instant proceedings, (c) right to trial by jury in any proceeding  
4 as to any and all matters so triable herein, whether or not the  
5 same be designated legal or private rights, or in any case  
6 controversy or proceeding related hereto, notwithstanding the  
7 designation or not of such matters as "core proceedings" pursuant  
8 to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is  
9 pursuant to statute or the United States Constitution, (d) right  
10 to have the reference of this matter withdrawn by the United  
11 States District Court in any matter or proceeding subject to  
12 mandatory or discretionary withdrawal, and (e) other rights,  
13 claims, actions, defenses, setoffs, recoupments or other matters  
14 to which JPMorgan Chase Bank, N.A., successor in interest by  
15 purchase from the Federal Deposit Insurance Corporation, as  
16 receiver for Washington Mutual Bank is entitled under any  
17 agreements at law or in equity or under the United States  
18 Constitution. This Request for Special Notice shall not operate  
19 as a confession or concession of jurisdiction.

20 DATED: September 3, 2015

Respectfully submitted,

21 TIFFANY & BOSCO, P.A.

22 BY/s/Theron S. Covey\_\_\_\_\_

23 Theron S. Covey, Esq.

24 William F. McDonald, Esq.

Attorney for Movant

TB File No: 15-80605